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October 24, 2024

Via ECF  
Hon. Dale E. Ho  
United States District Court  
Southern District of New York

Re: Floyd's of Leadville, Inc. N/K/A Valued, Inc. v. Alexander Capital L.P., et al.  
Case No. 1:22-CV-03318-DEH  
In Camera Submission Pursuant to Court Order [ECF 224]

Dear Judge Ho:

Pursuant to the Court's Order, defendant Ronald Barrie Clapham has submitted six searchable PDF files via a link provided by Your Honor's staff. These six files consist of emails to and from Mr. Clapham, on one hand, and either Mark Leonard, Thien Truong and Greg Hurley, each of whom was a shareholder of Redemption Holdings, Inc., at the time the emails were sent and during the period that Redemption Holdings, Inc. was represented by counsel in connection with the Colorado action entitled *Redemption Holdings, Inc. v. Floyds of Leadville, Inc.* 2020CV032866(Dist. Ct. CO.). Mr. Clapham respectfully submits that these documents are privileged pursuant to the common interest exception.

Emails among these individuals that predated Redemption's formation (except for attorney-client communications) were previously disclosed. In addition, emails that included as a recipient an individual who was not a member of Redemption were also previously disclosed. Not produced for this *In Camera* review are correspondences directly among the Redemption Holdings parties and their counsel.

Thank you for your attention to this matter.

Respectfully submitted,

  
Paul Rachmuth